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March 24, 2003

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**By Messenger**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

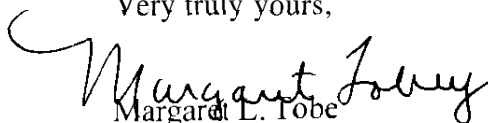
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: **Comments of Televiscentro of Puerto Rico, LLC**  
Notice of Proposed Rule Making  
Amendment of Section 73.606(b), Table of Allotments.  
Television Broadcast Stations  
Christiansted, Virgin Islands  
MB Docket No. 03-20, RM-I0634

Dear Ms. Dortch:

On behalf of Televiscentro of Puerto Rico, LLC ("Televiscentro"), licensee of commercial television station WAPA-TV, we are hereby enclosing an original and four copies of Televiscentro's comments in support of the above-referenced proceeding. Please direct any questions regarding this filing to undersigned counsel for Televiscentro.

Very truly yours,

  
Margaret L. Tobey

Enclosure

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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

MAR 24 2003

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.606(b), ) **MB** Docket No 03-20  
Table of Allotments, ) RM-10634  
Television Broadcast Stations. )  
(Christiansted, Virgin Islands) )

To: Chief Video Division

**COMMENTS OF TELEVICENTRO OF PUERTO RICO, LLC**

Televiscentro of Puerto Rico, LLC ("Televiscentro"), licensee of Station WAPA-TV, San Juan, Puerto Rico, by its attorneys and pursuant to Section 1.420 of the rules of the Federal Communications Commission ("Commission"), hereby submits its comments in support of the Notice of Proposed Rule Making in the above-captioned proceeding ("NPRM").<sup>2</sup> In response to the Petition for Rulemaking filed by Virgin Blue, Inc. ("VBI"), licensee of Station WCVI-TV, Channel 27, Christiansted, Virgin Islands, the Media Bureau is proposing to change WCVI-TV's analog assignment by substituting Channel 39 for its existing Channel 27. For the reasons set forth herein, Televiscentro urges the Commission to adopt expeditiously the change to the Table of Allotments proposed in the NPRM.

Televiscentro is a wholly owned subsidiary of LIN Television Corporation and permittee of Station WAPA-DT, Channel 27, San Juan, Puerto Rico. In late 2002, Televiscentro began operating Station WAPA-DT with reduced facilities pursuant to Special Temporary Authority

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<sup>1</sup> See 47 C.F.R. § 1.420 (2002).

<sup>2</sup> See *Amendment of Section 73.606(b), Table of Allotments, Television Broadcast Stations (Christiansted, Virgin Islands)*, MB Docket No. 03-20, RM-10634, 2003 FCC LEXIS 463 (MB, rel. Jan. 29, 2003).

(**'STA'**) granted by the Commission <sup>1</sup> After WAPA-DT commenced digital operations, VBI notified Televiscentro that WAPA-DT was causing interference to WCVI-TV's co-channel analog operations. Although WAPA-DT was operating in accordance with its authorization, Televiscentro voluntarily agreed to temporarily discontinue WAPA-DT's digital operations to allow the Commission and VBI an opportunity to resolve the interference problem.<sup>4</sup>

Televiscentro believes that prompt adoption of the NPRM would serve the public interest, VBI acknowledges that WAPA-DT is operating on its assigned channel and at the location and power level authorized by the Commission, but contends that WAPA-DT's digital operations on Channel 27 have reduced the number of potential viewers of WCVI-TV by more than 50 percent.<sup>5</sup> The channel substitution will enable WCVI-TV to reach all of its viewers, eliminate the interference between the two co-channel stations, and allow WAPA-DT to serve the San Juan area with digital service in accordance with the Commission's rules and policies.

For the foregoing reasons, Televiscentro urges the Commission to adopt the NPRM and promptly grant VBI's proposal to substitute Channel 39 for Channel 27. Prompt Commission action will resolve the interference between the two co-channel stations and will allow Televiscentro to resume broadcasting on WAPA-DT.

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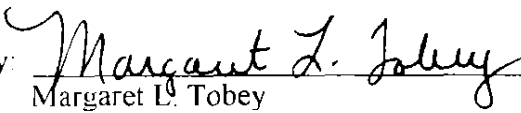
<sup>3</sup> See File No. BDSTA-Z0021031ACB (granted Nov. 8, 2002).

<sup>4</sup> See Letter from Margaret L. Tobey, Counsel to Televiscentro of Puerto Rico, LLC, to Marlene H. Dortch, Secretary of the FCC (Dec. 6, 2002) (notifying the Commission of temporary discontinuance of operations). In February 2003, the Commission granted WAPA-DT's STA request to remain off the air for a 180-day period in order to allow VBI an opportunity to prosecute the NPRM. See File No. BRDSTA-20030115ABW (granted Feb. 20, 2003).

<sup>5</sup> See **YPRM** at 1

Respectfully submitted,

**TELEVICENTRO OF PUERTO RICO, LLC**

By:   
Margaret L. Tobey  
Iris F. Rosario

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*Its Attorneys*

Dated: March 24, 2003

## CERTIFICATE OF SERVICE

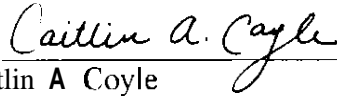
I, Caitlin **A** Coyle, a legal assistant in the law offices of Morrison & Foerster LLP, do hereby certify that I have, on this 24th day of March, 2003, caused copies of the foregoing “**COMMENTS OF TELEVICENTRO OF PUERTO RICO, LLC**” sent via U.S. mail, postage prepaid, to the following:

Barbara **A** Kreisman \*  
Chief, Video Division  
Media Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Pamela Blumenthal \*  
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President  
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Caitlin **A** Coyle

\* Denotes hand delivery